## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ANA R. OLIVELLA RIVERA \* CIVIL NO.: 98-2267 (JAG)

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Plaintiff

V.

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JURY TRIAL DEMANDED

POPULAR LEASING AND RENTAL, INC., ET AL.

\*

Defendants

\* \*------\*

## MOTION FOR EXTENSION TO FILE JOINT PRE-TRIAL REPORT TO THE HONORABLE COURT:

COME NOW defendants PREFERRED RISK INSURANCE COMPANY (erroneously denominated Puerto Rican American Insurance Company) and BANCO POPULAR DE PUERTO RICO, represented by the undersigned attorneys, and before the Honorable Court respectfully tenders this proposed pre-trial order:

- 1. This Honorable Court issued an order that the parties shall meet on or before Friday, June 9, 2006 to agree to a joint final pre-trial order.
- 2. The attorney for plaintiffs stated to the undersigned that he was available to meet on June 8 after he finished attending a state court hearing which was scheduled for the morning of June 8, 2006. He expressed that he didn't know how long the hearing would take place and when he would be out of the court. It was agreed that I would call to his office around 11:30 a.m. to see his availability. Around that time, the undersigned and plaintiff's

attorney held a conversation in which the undersigned attorney expressed that she was available to meet on June 8 in the afternoon and that attorney López Pumarejo was also available. However, attorney Oliveras stated that he had depositions scheduled and that it would be impossible to meet on the afternoon of June 8, 2006.

- 3. Attorney Oliveras also expressed that due to previous commitments regarding depositions and court appearances scheduled for June 9 and June 12, the only time available for him to meet in order to prepare the pre-trial order was June 13 at 4:00 p.m. Both the undersigned attorney and attorney López Pumarejo are also available to meet on that date and hour.
- 4. Due to the above, a short extension is requested from this Honorable Court in order for the parties to be able to meet and prepare a final joint pre-trial order on June 13, 2006 at 4:00 p.m. and to file said joint pre-trial order on that same date or at the latest on June 14, 2006.

WHEREFORE, it is respectfully requested that this Honorable Court takes notice of the above and that a short extension be granted to file the joint pre-trial order on June 14, 2006.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Rafael A. Oliveras López, Esq.; David López Pumarejo, Esq.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this  $9^{th}$  day, of June, 2006.

s/ Ana María Otero
USDC No. 206312
Attorney for defendants
Preferred Risk Insurance Company
and Banco Popular de Puerto Rico
OTERO & LOPEZ, L.L.P.
P.O. Box 9023933

San Juan, P.R. 00902-3933

Tel: 724-4828 Fax: 722-7662

e-mail: otelo@prtc.net